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SUBJECT: Responds to NUMARC request for addl info re station blackout submittals.

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Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
ADDITIONAL INFORMATION FOR STATION BLACKOUT (SBO) (10 CFR 50.63)

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Attn: T. E. Murley

March 30, 1990

Dear Dr. Murley:

This letter responds to a request by the NUMARC Board of Directors, in a letter dated January 4, 1990, for each licensee to supplement their previous SBO submittals. This submittal is to be based on clarifications pertaining to the SBO issue developed in cooperation with your staff and attached to the January 4 NUMARC letter. Our previous submittal on the SBO issue was in response to 10 CFR 50.63, "Loss of All AC Power," and was contained in letter AEP:NRC:0537D dated April 14, 1989.

An additional purpose for transmitting the information contained herein is to assert to the best of our knowledge our adherence to the methodology contained in NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors," except for those clarifications noted below.

We also wish to inform you that the target reliability emergency diesel generator (EDG) of 0.975 established for our four-hour AC-independent coping category will be maintained. The maintenance of this target reliability is a subject just recently addressed by NUMARC through SBO Initiative 5A via a letter dated March 14, 1990. This initiative is presently being considered for implementation. It should be further noted that periodic surveillances used to establish EDG reliability are conducted in accordance with Cook Nuclear Plant Technical Specifications that reference Regulatory Guide 1.108, as opposed to the NSAC-108 document referenced in NUMARC 87-00. A T/S change, however, may be pursued regarding the adoption of NSAC-108, as well as Initiative 5A discussed above.

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Based on a review of our April 14, 1989 submittal and supporting information, as well as the clarifications contained in the attachments to the January 4, 1990 NUMARC letter, the following types of items will be discussed:

- 1) Additional SBO-related procedure changes, and
- 2) Additional plant modifications.

Procedure Changes

With respect to the need to ensure an adequate condensate storage tank (CST) inventory, as well as to avoid TDAFW pump runout conditions, limitations for TDAFP operation will be procedurally provided in the EOP for the SBO scenario.

The need for procedural requirements for opening control room cabinet doors was identified in our review. Based on our determination that control room temperatures did not exceed 120°F using NUMARC 87-00 (Section 7.2.4), it was our understanding that no further action was required (Section 2.7.1). However, further clarifications provided by NUMARC made the need evident for opening control room cabinet doors associated with SBO equipment.

The procedure changes discussed above will be completed by June 30, 1990.

Modifications

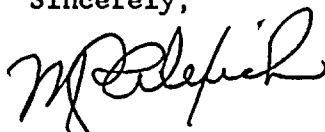
In the course of verifying the availability of instrumentation and controls called out in the SBO EOP, it was found that direct indication of RCS temperature could be lost in the SBO scenario. Two of four RCS temperature channels are normally powered by an opposite unit diesel-backed power source. However, based on single failure criteria postulated within NUMARC 87-00 for the non-SBO unit, this opposite unit power source may not be available. Direct RCS pressure indication may be lost for use in the SBO-recovery EOP depending on the source of power established for recovery. Modifications necessary for ensuring direct indication of RCS pressure and temperature in the event of a SBO are scheduled for implementation during both units' 1990 refueling outages. An Operations Department memorandum has been issued to inform operators how to obtain these process variables from other sources. Procedures for the SBO scenario will be modified to incorporate information contained in the Operations Department memorandum.

The need for several additional emergency lights was identified for equipment operations not addressed by Section III.J of 10 CFR 50, Appendix R. Battery-powered emergency lights will be added to

provide lighting for those areas identified via a design change package. A design change package will be generated for the addition of the emergency lights. This design change will be input into the Long-Range Planning Module of the Cook Nuclear Plant Integrated Management System for the generation of an appropriate schedule. At present, operators have flashlights available for routine tours, as well as for use in an emergency situation (i. e., in the event of a SBO).

This document has been prepared following Corporate procedures that incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Sincerely,



M. P. Alexich
Vice President

ldp

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